



June 1, 2017

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*Re: **Starry, Inc. Notice of Ex-Parte Communication**; Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al., GN Docket No. 14-177, IB Docket Nos. 15-256 and 97-95; RM-11664; and WT Docket No. 10-112*

Dear Ms. Dortch:

On May 30, 2017, Starry, Inc., represented by Chet Kanojia, Chief Executive Officer and Virginia Lam Abrams, Senior Vice President of Communications & Government Relations, along with Starry investors represented by Richard Sarnoff of KKR and Amish Jani of FirstMark Capital, participated in a meeting at the Federal Communications Commission ("Commission") with Commission Chairman Ajit Pai and Alison Nemeth, Legal Advisor to the Chairman.

During the meeting, Starry briefed Chairman Pai on Starry's proprietary 5G fixed wireless technology and the company's deployment progress in Boston and other cities. Starry continues to expand its base of beta customers in the Boston area and plans to expand to additional cities before the end of 2017. Chairman Pai inquired about anti-competitive behavior and whether Starry was experiencing any issues such as blocked access to buildings. Starry has not explicitly been blocked from serving any particular building, but has found that a certain percentage of MDU's have entered into exclusive marketing agreements with incumbent providers, creating roadblocks in the ability to communicate with tenants about alternative providers. While such agreements are onerous for tenants, Starry does not believe that they are an insurmountable obstacle to building our business.

Starry also reiterated its support for preserving commercial-to-commercial sharing in the lower 37 GHz band as proposed in the *Spectrum Frontiers Report & Order* and encouraged a timely issuance of the second *Report & Order* to unleash additional spectrum into the marketplace. Mr. Sarnoff and Mr. Jani offered an investor perspective on the market and how preserving a diverse licensing approach (sharing, exclusively-licensed and unlicensed) in these bands would spur additional investment in a wide range of companies, using Starry as a primary example. Mr. Sarnoff shared his perspectives on the market opportunity for 5G and how spectrum availability would be a major driver and determine the speed and success of that

market. Mr. Jani added that the venture investment community has long stayed away from investment in communications infrastructure companies due of the lack of competition in the market, which effectively narrowed the field of technology providers and stymied any meaningful growth and innovation in that sector. Mr. Jani believes that preserving sharing in the lower 37 GHz band would create a platform that enables new companies to enter the market and compete without unnecessarily high barriers to entry for accessing spectrum, which in turn, would unleash venture capital investment.

Starry also believes that given the characteristics of this band and the potential for spectrum re-use, sharing in the lower 37 GHz band can be coordinated using a simple site-based registration system, which would eliminate the need to utilize a complicated spectrum management system. Ultimately, as the development of new 5G technologies continues, Starry believes that it is critical that the Commission employ a diverse set of licensing models to encourage the maximum amount of innovation in these millimeter wave bands. No one can predict with a certainty what technologies will emerge in the 5G evolution and moving towards an exclusively-licensed only model would effectively shut out new entrants into this space.

Chairman Pai also inquired about satellite sharing issues and the proposal to increase power levels for proposed satellite operations. Starry reiterated its concern that increasing power flux density levels for lower orbiting satellite constellations would have an adverse effect on terrestrial fixed operations.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced dockets. We have also provided a copy of this letter electronically to all Commission personnel who were in attendance. Please contact the undersigned with any questions.

Respectfully submitted,
Virginia Lam Abrams
Starry, Inc.

cc:
Chairman Ajit Pai
Alison Nemeth